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9 *Attorneys for Defendant*
10 *American Family Insurance Company*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 LESLIE ANN TREJO, GUADALUPE
14 RODRIGUEZ, and MANUEL RODRIGUEZ,
15 individuals,

16 Plaintiffs,

17 vs.

18 AMERICAN FAMILY INSURANCE
19 COMPANY, a Foreign Corporation; DOE
20 EMPLOYEES I-V and ROE COMPANIES I-V,

21 Defendants.

CASE NO.: 2:20-cv-02039-APG-EJY

22 **STIPULATION AND ORDER TO**
23 **EXTEND DISCOVERY**
24 **(Second Request)**

25 The parties, by and through their counsel of record, submit their second Stipulation to
26 Extend Discovery pursuant to LR 26-3 and LR IA 6-1:

27 1. Discovery that has been completed:

28 a. Plaintiffs served their initial disclosures pursuant to FedRCivP 26(a)(1)
on January 7, 2021

b. Defendant served its initial disclosures pursuant to FedRCivP 26(a)(1)
on January 22, 2021.

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1 c. Defendants propounded Interrogatories and Requests for Production to
2 Plaintiffs, Leslie Ann Trejo, Guadalupe Rodriguez, and Manuel Rodriguez on
3 December 8, 2020. Plaintiffs responded to the Interrogatories and Requests for
4 Production on January 11, 2021.

5 d. Plaintiffs propounded Interrogatories, Requests for Admission and
6 Requests for Production to Defendant on February 22, 2021. Plaintiff responded to the
7 Interrogatories, Requests for Admission and Requests for Production on April 7, 2021.

8 e. Defendant has taken the depositions of Plaintiffs Guadalupe Rodriguez
9 and Manuel Rodriguez.

10 f. The parties have disclosed their initial experts.

11 3. Discovery remaining to be completed:

12 a. The retention and disclosure of the parties' rebuttal experts.

13 b. The deposition of the plaintiff Leslie Trejo, the Person Most
14 Knowledgeable from American Family Insurance Company, other potentially relevant
15 witnesses and the parties' experts.

16 c. Additional written discovery.

17 4. Description of why remaining discovery has not been completed within the
18 time limits previously set by the Court:

19 There have been significant difficulties and delays in obtaining plaintiff Leslie Trejo's
20 prior medical records. This information is necessary before proceeding with taking her
21 deposition. This has also resulted in Defendant's expert being limited in his evaluation of the
22 claim. The parties continue to work together to address this issue so that Defendant is able to
23 fairly and thoroughly evaluate Plaintiffs' claims. Consequently, Defendant requires additional
24 time in order to be able to properly defend against Plaintiffs' claims. Accordingly, the parties
25 respectfully request a sixty (60) extension of the discovery deadlines.

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5. Proposed schedule for completing all remaining discovery:

Based on the foregoing, the parties respectfully request that the Court grant their joint request to extend the discovery deadlines in accordance with the schedule below:

	Current	Proposed Dates
Discovery Cut-Off Date	08/17/21	10/18/21
Amend Pleadings or Add Parties	CLOSED	CLOSED
Expert Witness Disclosure	CLOSED	CLOSED
Rebuttal Expert Disclosures	07/19/21	09/20/21
Dispositive Motions	09/17/21	11/17/21
Joint Pretrial Order	10/18/21	12/17/21
Stipulation or Motion to Extend Discovery	06/28/21	08/27/21

IT IS SO STIPULATED.

DATED this 28th day of June, 2021.

VAN LAW FIRM

/s/ Joseph Ortuno

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*Attorneys for Plaintiffs Leslie Ann Trejo,
Guadalupe and Manuel Rodriguez*

DATED this 28th day of June, 2021.

HUTCHISON & STEFFEN, PLLC

/s/ Scott A. Flinders

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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: June 28, 2021

1 Submitted by:

2 HUTCHISON & STEFFEN, PLLC

3 /s/ *Scott A. Flinders*

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